

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

Kenneth D. Bell in his capacity as court
appointed Receiver for Rex Venture Group, LLC
d/b/a Zeek Rewards.com

Plaintiff,

v.

Hamish Browne, Praveen Kumar, and David Ian
MacGregor Fraser

Defendants.

Civil Action No.: 3:15-cv-70

MOTION FOR EXTENDING TIME TO RESPOND

Now come the undersigned on behalf of Defendant David Ian MacGregor Fraser (“Fraser”) and show unto the Court as follows

1. Frazer is a citizen of Auckland City, New Zealand.
2. On or about March 2, 2015 Fraser was delivered a copy of the Summons and Complaint in this matter in his native New Zealand.
3. The time for filing a responsive pleading has not expired; and
4. The Defendant, Fraser requires additional time to research his defenses and file an answer or otherwise respond to Plaintiff's Complaint;
5. Plaintiff's counsel has indicated consent to a reasonable extension of time to file a responsive pleading.

Now therefore, the undersigned counsel for the Defendant, Fraser, with the consent of counsel for the Plaintiff, hereby moves the Court for an extension of time to and including May 8, 2015 to file its responsive pleading.

Respectfully submitted, this the 23rd day of March, 2015

/s/June K. Allison

June K. Allison (N.C. Bar # 9673)
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that the foregoing was electronically filed with the Clerk of Court using the CM/ECF system and was served on the Defendants by electronic mail and by depositing a copy of same in the U.S. Mail, first-class, postage prepaid, addressed as follows:

Kenneth D. Bell, Receiver
Irving Brenner
Matthew F. Orso
McGuire Woods, LLP
201 N. Tryon Street
Suite 3000
Charlotte, N.C. 28202

This the 23rd day of March, 2015.

/s/June Allison
June K. Allison
David M. Grogan